



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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Environmental Cleanup Office

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Dirk Kempthorne, Governor
C. Stephen Allred, Director

January 26, 2001

Mr. Wallace Reid
EMF Remedial Project Manager
USEPA Region 10
1200 Sixth Avenue
Seattle, WA 98101

SUBJECT: **IDEQ Comments on 1/16/01 Technical Memorandum Regarding Eastern
Michaud Flats Fluoride Contamination**

Dear Wallace,

Pursuant to your request, the Idaho Department of Environmental Quality (IDEQ) provides the following written comments regarding the aforementioned technical memorandum. As discussed in our meeting of the 17th, IDEQ generally concurs with your conclusions to supplement the Administrative Record with the new fluoride data that has been made available, and your recommendations for enhancing the Record of Decision (ROD) to ensure it is protective in this regard. Our comments primarily address additional specificity in the *Summary of the Existing Fluoride Data* and *Recommendations* sections of the subject memorandum.

In the last paragraph of page 2, the memorandum briefly discusses the September 27th presentation of fluoride information provided by Ms. Melissa Keller of the IDEQ. The second bulleted item in this paragraph refers to the J.R. Simplot plant's noncompliance with the existing State fluoride standard. We believe it would be helpful to elaborate on this issue in the summary of the existing data. It was clear from Melissa's briefing that the State program requires fluoride monitoring of vegetation only in areas used for livestock grazing. The data presented to us indicated significant fluoride exceedances south of the plant over many years of operation. However in 1996, monitoring south of the plant was terminated without explanation. The BLM land manager was apparently not aware of the fluoride impacts but this action effectively resulted in removing the previously observed impacted area from the State regulatory monitoring program. It is likely that this area continues to be impacted by plant operations and should be part of any subsequent monitoring program to protect future grazing resources and foraging wildlife.

Item 1 of the recommendations requests additional information from FMC and Simplot regarding fluoride emissions from continuing operations. This item should specify the development of an accurate mass balance based on operating data for all potential sources. The initial PRP effort could be based on existing data, however, if a high level of uncertainty exists concerning potential sources of significance, the necessary testing should be performed to fill this data gap.



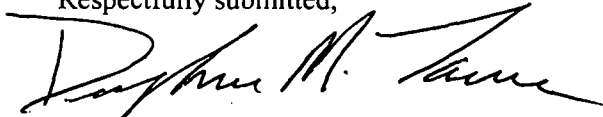
Item 3 of the recommendations requires a comprehensive review of existing data by the Companies to identify samples in excess of the human health or ecological risk targets. As discussed, the IDEQ does not believe these targets currently exist or are easily achievable in the short term. Therefore, the revised Record of Decision should establish the process and schedule for achieving risk-based criteria as an integral part of the fluoride monitoring program contemplated in the current ROD. This effort should be directed to the media and receptors found to be exposed to elevated levels of fluoride, and should also be sensitive to particular biomarkers of tribal concern. The responsibilities for developing the monitoring program and initial risk targets should be delegated to the Companies with final review and approval by the Agencies and Tribe. Similarly, the proposed remedies should be based on the resulting risks with subsequent Agency review and approval.

Finally, Item 5 of the recommendations requires the Companies to identify land uses within a ten-mile radius and superimpose existing fluoride data on the map. As summarized in Item 4 of your conclusions, fluoride impacts have been observed outside of the three-mile radius specified in the current Record of Decision. The revised ROD should clearly require additional data gap screening beyond the three-mile radius for areas in the path of prevailing winds, sensitive perimeter areas such as domestic gardens or pastures, and any other areas suspected to be impacted based on the existing data record. The extension of the radius should apply only to specific areas of observed impact based on early monitoring results and should not consist of an arbitrary selection of a new stipulated radius. Obviously, the remedy process should also extend to those areas presenting risk.

In conclusion, the IDEQ agrees that based on new information the current Administrative Record and Record of Decision should be embellished regarding fluoride contamination for Eastern Michaud Flats. The existing data record indicates recurring and ongoing violations of applicable State regulatory standards for fluoride uptake in forage. However, these regulations do not address risks associated with deposition in soils or receptors other than livestock. The revised ROD must establish a process for assessing accurate plant fluoride emission/deposition projections, evaluating existing areal conditions and impacts, developing protective risk-based targets for the appropriate media and receptors, and implementing suitable remedies for risk reduction.

Should you have any questions regarding our comments, please do not hesitate to call.

Respectfully submitted,



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